

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff,

v.

ZILLOW GROUP, INC.; ZILLOW, INC.,

Defendants.

NO. 2:20-cv-00851-TSZ

IBM'S RESPONSE TO ZILLOW'S NOTICE
OF FILING OF PETITIONS FOR INTER
PARTES REVIEW

Plaintiff International Business Machines Corporation ("IBM") hereby responds to Defendants Zillow Group, Inc.'s and Zillow, Inc.'s ("Zillow") Notice of Filing of Petitions for Inter Partes Review ("IPRs") on a subset of the patents-in-suit. Dkt. 135. Zillow has taken claim construction positions before the Patent Trial and Appeals Board that contradict those it has taken in this district court action. IBM is prepared to address this issue, including its impact on claim construction scheduling, at the Court's upcoming status conference concerning the parties' Joint Status Report. Dkt. 131.

1 DATED this 25th day of September, 2020.

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